

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

TAMMY WALDEN THOMAS,

Defendant.

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3:21-CR-046-N

MOTION FOR LEAVE TO FILE REPLY BRIEF AND CLARIFICATION
IN SUPPORT OF THE MOTION TO CONTINUE

Pursuant to Local Criminal Rule 47.1(f), Defendant **TAMMY WALDEN THOMAS** moves this Court for leave to file a reply to the government's sealed response, *see* Dkt. No. 25, and in support and clarification of her motion to continue, *see* Dkt. No. 22.

On July 16, 2021, the government filed a response opposing the relief sought in Ms. Thomas's motion to continue. Based on the arguments made by counsel in the response brief, the defense submits that a reply brief will be of assistance to the Court in deciding the issues raised in the motion to continue.

Specifically, Ms. Thomas wanted to clarify that the defense has no objection to a trial date set within the first half of 2022. If the parties do not reach a resolution prior to the birth, counsel may need to seek a continuance due to her maternity leave. Counsel anticipates starting maternity leave in September 2021 and returning to the office in February 2022; thus, in anticipation of the possible need of a further continuance, Ms. Thomas has no objection to trial date set within the first half of 2022.

Respectfully submitted,

JASON D. HAWKINS
Federal Public Defender
Northern District of Texas

s/ Gabriela Vega
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CERTIFICATE OF CONFERENCE

I hereby certify that on July 23, 2021, I conferred with Assistant United States Attorney (“AUSA”) Fabio Leonardi concerning this motion. AUSA Leonardi confirmed the government does not oppose the defendant’s motion for leave to file a reply, but is opposed to rescheduling trial in this case to 2022.

s/ Gabriela Vega
M. GABRIELA VEGA